

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

PEDRO MARTINEZ,

Plaintiff,

v.

PLUSHCARE, INC.

Defendant.

Case No. 1:21-cv-1185-DG-PK  
**STIPULATION OF DISMISSAL WITH  
PREJUDICE**

**IT IS HEREBY STIPULATED AND AGREED**, by and between the undersigned counsel for the parties, plaintiff Pedro Martinez and defendant PlushCare, Inc. (collectively, the “Parties” and individually a “Party”), that, pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, and pursuant to a settlement agreement that shall be judicially enforceable, all of the claims that were asserted or that could have been asserted in the above-captioned action are hereby dismissed with prejudice and without costs to any Party as against the other.

**IT IS HEREBY FURTHER STIPULATED AND AGREED** that counsel for the Parties have been authorized by their respective clients to execute this Stipulation.

**IT IS HEREBY FURTHER STIPULATED AND AGREED** that no Party hereto is an infant or incompetent person for whom a committee or conservator has been appointed.

**IT IS HEREBY FURTHER STIPULATED AND AGREED** that facsimile/photocopy signatures may be accepted as originals for all purposes, including filing with the Court.

**IT IS HEREBY FURTHER STIPULATED AND AGREED** that this Stipulation may be filed, without further notice, with the Clerk of the Court by any Party herein.

Dated: May 5, 2021

SHAKED LAW GROUP, P.C.

By: /s/Dan Shaked  
Dan Shaked  
14 Harwood Court, Suite 415  
Scarsdale, NY 10583  
Phone: (917) 373-9128  
Facsimile: (718) 504-7555  
Email: shakedlawgroup@gmail.com  
*Attorneys for Plaintiff*

FENWICK & WEST, LLP

By: /s/Matthew F. Damm  
Matthew F. Damm, Esq.  
902 Broadway, Suite 14  
New York, New York 10010  
Telephone: (212) 430-2732  
Facsimile: (650) 938-5200  
Email: mdamm@fenwick.com  
*Attorneys for Defendant*

**SO ORDERED:** \_\_\_\_\_